

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

**[PROPOSED] ORDER
APPOINTING INTERIM CLASS
COUNSEL FOR INDIRECT-
PURCHASER PLAINTIFFS**

Honorable Samuel Conti

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1 1. Pursuant to Federal Rule of Civil Procedure 23(g)(2)(A), Zelle, Hofmann,
2 Voelbel, Mason & Gette LLP and Lovell Stewart Halebian LLP are appointed as Interim Co-
3 Lead Class Counsel for the Indirect-Purchaser Plaintiff Class;

4 2. Indirect-Purchaser Plaintiffs' Interim Co-Lead Class Counsel shall have the
5 following responsibilities on behalf of all Indirect-Purchaser Plaintiffs in all coordinated and
6 add-on cases:

- 7 a. To determine and to present in motions, briefs, oral argument or such
8 other fashion as may be appropriate, (either personally or by
9 designee) to the Court and opposing parties, the position of all of the
10 Indirect-Purchaser Plaintiffs as to all matters arising during all pretrial
11 and trial proceedings;
- 12 b. To designate attorneys to act as spokespersons at pretrial conferences;
- 13 c. To conduct or coordinate discovery on behalf of the Indirect-Purchaser
14 Plaintiffs consistent with the Federal Rules of Civil Procedure,
15 including the preparation of joint interrogatories, requests for
16 production of documents, requests for admissions and the
17 examination of witnesses in depositions;
- 18 d. To designate an attorney to enter into stipulations with opposing
19 counsel necessary to conduct the litigation;
- 20 e. To monitor the activities of co-counsel and to implement procedures to
21 ensure that schedules are met and unnecessary expenditures of time
22 and funds by counsel are avoided;
- 23 f. To sign any consolidated complaint, motions, briefs, discovery
24 requests or objections, subpoenas or notices on behalf of all Indirect-
25 Purchaser Plaintiffs or those plaintiffs filing the particular papers;
- 26 g. To conduct all pre-trial, trial and post-trial proceedings on behalf of all
27 Indirect-Purchaser Plaintiffs;
- 28 h. To employ and consult with experts;

- i. To call meetings of Indirect-Purchaser Plaintiffs' counsel when appropriate;
- j. To conduct settlement discussions with defense counsel on behalf of the Indirect-Purchaser Plaintiffs and the putative class;
- k. To assure that all Indirect-Purchaser Plaintiffs' Counsel are kept informed of the progress of this litigation as necessary;
- l. To make all work assignments to Indirect-Purchaser Plaintiffs' counsel in such a manner as to promote the orderly and efficient prosecution of this litigation and to avoid unnecessary duplication and unproductive efforts for all parties;
- m. To ensure that work assignments to all Indirect-Purchaser Plaintiffs' Counsel are made in the best interests of the Indirect-Purchaser Plaintiffs and the proposed class and are made on the basis of the qualifications and expertise of the persons assigned particular tasks or responsibilities, counsel's knowledge of the law, facts and issues, efficiency and cost-effectiveness;
- n. To assess Indirect-Purchaser Plaintiffs' Counsel common litigation costs and to collect all assessments on a regular basis;
- o. To collect time, lodestar and expense reports from each Indirect-Purchaser Plaintiffs' Counsel, including paralegals and any other staff members whose time is expected to be included in any fee petition;
- p. To ensure that work assignments are not given to any Indirect-Purchaser Plaintiffs' Counsel firm that has not promptly submitted its time and expense records or paid its assessments;
- q. To select law firms to act as Indirect-Purchaser Plaintiffs' Executive Committee in this consolidated action and to manage the Committee and any subcommittees thereof. The role of the Executive Committee shall be to assist Interim Class Counsel in the prosecution of the

consolidated action as directed and supervised by Interim Class Counsel.

- r. To coordinate and communicate with Defense Counsel;
- s. To coordinate and communicate with Direct-Purchaser Plaintiffs' Class Counsel in the Direct-Purchaser Actions;
- t. To coordinate and communicate with Plaintiffs' Counsel in Indirect-Purchaser Actions which remain in state courts, if any, as to discovery and other related issues; and
- u. To otherwise coordinate the work of all Indirect-Purchaser Plaintiffs' Counsel, and perform such other duties as necessary or as authorized by further order of the Court.

3. The Interim Co-Lead Class Counsel are hereby designated as the counsel for plaintiffs in the related actions upon whom all notices, orders, pleadings, motions, discovery, and memoranda relating to the indirect purchaser consolidated actions shall be served, and defendants shall effect service of papers on the indirect purchaser plaintiffs in the consolidated actions by serving each of the Interim Co-Lead Class Counsel above. An agreement reached between defendant(s) and Interim Co-Lead Class Counsel or their designee(s), shall be binding on all other plaintiffs' counsel in the indirect purchaser consolidated actions.

4. All counsel shall keep a daily record of their time spent and expenses incurred in connection with this litigation, indicating with specificity the hours, location, and particular activity. Further, all counsel shall endeavor to keep attorneys' fees reasonable and to choose the most appropriate level of staffing for the tasks required in this litigation.

IT IS SO ORDERED.

Dated: _____, 2008

Honorable Samuel Conti
UNITED STATES DISTRICT COURT

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